



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

271 Cadman Plaza East

Brooklyn, New York 11201

June 30, 2009

By ECF

The Honorable Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joseph Orlando, et al.
Criminal Docket No. 09-357 (ENV)

Dear Judge Vitaliano:

The government respectfully writes to consent to defendant Giovanni Monteleone's request for modification of his bail conditions to eliminate electronic monitoring, given his demonstration of loss of income from late night towing and related repairs.

In light of the danger the defendant poses, however, the government requests the following in lieu of electronic monitoring:

- (1) the defendant be confined to his home after the work hours already established by Pretrial Services, except that the defendant may leave his home after work hours when late night towing jobs require him personally to participate in a tow;
- (2) the defendant maintain documentation of each late night tow to substantiate any absence from his home after work hours; and
- (3) the defendant provide the documentation identified in (2) to the United States Attorney's Office and Pretrial Services on the first day of each month as to each prior month.

Thank you for your consideration.

Respectfully submitted,

BENTON J. CAMPBELL
United States Attorney

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John Buretta
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cc: Mitchell Golub, Esq. (By ECF)